IN THE UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:)	Case No. 09-50026 (REG)
GENERAL MOTORS CORP., et al.)	Chapter 11
Debtors)))	(Jointly Administered)

CURE AMOUNT OBJECTION OF COMPREHENSIVE LOGISTICS CO., INC.

NOW COMES Comprehensive Logistics Co., Inc. ("Comprehensive Logistics"), by and through its undersigned counsel, and hereby submits its Cure Amount Objection, and in support thereof states as follows:

- 1. On June 8, 2009, Comprehensive Logistics received the *Notice of (I) Debtors' Intent to Assume and Assign Certain Executory Contracts, Unexpired Leases of Personal Property, and Unexpired Leases of Nonresidential Real Property and (II) Cure Amounts Related Thereto* (the "Assumption and Assignment Notice"). The Assumption and Assignment Notice provided Comprehensive Logistics with a user ID and password in order to access the Cure Amount for the Assumable Executory Contracts to which Comprehensive Logistics is a party by reviewing information on the Debtors' website.
- 2. The Debtors list the Cure Amounts for the agreements between the Debtors and Comprehensive Logistics at \$2,058,695.65.

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3. According to the records of Comprehensive Logistics, the Cure Amounts for the

Assumable Executory Contracts is actually \$7,664,561.57. Evidence of the additional Cure

Amounts as of the petition date is attached hereto as **Exhibit A**.

4. Comprehensive Logistics objects to the Cure Amounts asserted by the Debtors and

submits that the correct amount is \$7,664,561.57.

5. In addition, the Debtors should be required to cure any unpaid post-petition

obligations through the Assumption Effective Date as defined in the Notice sent by the Debtors.

To the extent that the Debtors satisfy all of the post-petition obligations to Comprehensive Logistics

under the Assumed Contracts from and after the petition date through the Assumption Effective

Date, then the Cure Amounts must include the additional pre-petition amounts identified in Exhibit

A attached hereto.

WHEREFORE, based upon the foregoing, Comprehensive Logistics requests that the correct

Cure Amount for the Assumable Executory Contracts be established in the amount of

\$7,664,561.57.

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DATED: June 12, 2009

Respectfully submitted,

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Counsel for Comprehensive Logistics Co., Inc.

2

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **Cure Amount Objection of Comprehensive Logistics Co., Inc.** was served by overnight mail, postage prepaid, this 12th day of June, 2009, upon the following counsel of record:

General Motors Corporation Attn: Warren Command Center Mail Code 480-206-114 Cadillac Building 30009 Van Dyke Avenue Warren, MI 48090-9025 Debtors

Harvey R. Miller, Esq. Stephen Karotkin, Esq. Joseph H. Smolinsky, Esq. Weil, Gotshal & Manges, LLP 767 Fifth Avenue New York, NY 10153 Attorney for Debtors

U.S. Treasury Attn: Matthew Feldman, Esq. 1500 Pennsylvania Avenue, NW Room 2312 Washington, DC 20220

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John J. Rapisardi, Esq. Cadwalader, Wickersham & Taft, LLP One World Financial Center New York, NY 10281 Attorneys for the Purchaser Gordon Z. Novod, Esq. Kramer Levin Naftalis & Frankel, LLP 1177 Avenue of the Americas New York, NY 10036 Attorneys for the Creditors Committee

Michael J. Edelman, Esq. Michael L. Schein, Esq. Vedder Price, P.C. 1633 Broadway, 47th Floor New York, NY 10019 Attorneys for Export Development Canada

Office of the United States Trustee Southern District of New York Attn: Diana G. Adams, Esq. 33 Whitehall Street, 21st Floor New York, NY 10004

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